

# U.S. Department of Energy Office of River Protection

P.O. Box 450, MSIN H6-60 Richland, Washington 99352

AUG 17 2007

07-ESQ-130

Ms. Jane A. Hedges, Program Manager Nuclear Waste Program State of Washington Department of Ecology 3100 Port of Benton Blvd. Richland, Washington 99354



Dear Ms. Hedges:

SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT MODIFICATION NOTIFICATION FORM 24590-LAW-PCN-ENV-07-001

Reference:

WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource

Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of

Dangerous Waste, Part III, Operating Unit 10, 'Waste Treatment and

Immobilization Plant."

This letter submits the Hanford Facility RCRA Permit Modification Notification Form 24590-LAW-PCN-ENV-07-001 (Attachment 1). The form describes a requested Class 1 modification to the Reference requiring approval from the Washington State Department of Ecology (Ecology). A Bechtel National, Inc. certification statement is provided in Attachment 2.

Modification Notification Form 24590-LAW-PCN-ENV-07-001 updates the Piping and Instrumentation Diagrams (24590-LAW-M6-LFP-P0001 and 24590-LAW-M6-LFP-P0003) for the Low-Activity Waste Melter Feed Process System, Melter Feed Preparation, and Melter Feed (LFP-VSL-00001/2/3/4) found in Appendix 9.2 of the Reference.

Ecology was provided an opportunity to review the modification notification form and the associated information and comments were dispositioned.

If you have any questions, please contact me, or your staff may contact Lori A. Huffman, Office of Environmental Safety and Quality, (509) 376-0104.

Sincerely.

Shirley J. Winger, Acting Manager

Office of River Protection

ESQ:LAH

Attachments: (2)

cc: See page 2

#### cc w/attachs:

Administrative Record *H-0-8* BNI Correspondence

Environmental Portal, LMSI

#### cc electronic:

W. S. Elkins, BNI

B. G. Erlandson, BNI

P. A. Fisher, BNI

J. S. Hill, BNI

S. Murdock, BNI

P. Peistrup, BNI

D. Robertson, BNI

B. Becker-Khaleel, Ecology

E. A. Fredenburg, Ecology

T. Gao, Ecology

A. A. Hamar, Ecology

S. A. Thompson, FHI

A. C. McKarns, RL

D. J. Sommer, SCS

#### cc w/o attachs:

D. A. Klein, BNI

J. Cox, CTUIR

S. Harris, CTUIR

L. Cusack, Ecology

S. L. Dahl, Ecology

G. P. Davis, Ecology

G. Bohnee, NPT

K. Niles, Oregon Energy

R. Jim, YN

### Attachment 1 07-ESQ-130

Hanford Facility RCRA Permit Modification Notification Form 24590-LAW-PCN-ENV-07-001

### Hanford Facility RCRA Permit Modification Notification Form Part III, Operating Unit 10

#### **Waste Treatment and Immobilization Plant**

#### Index

Page 2 of 3:

Hanford Facility RCRA Permit, Operating Unit 10, Waste Treatment and Immobilization Plant

Update LAW Vitrification Building Piping and Instrumentation Diagrams (P&ID) for the LAW Melter Feed Process System Melter 1 and 2 Feed Preparation and Feed (LFP-VSL-00001, LFP-VSL-00002, LFP-VSL-

00003, and LFP-VSL-00004) in Appendix 9.2 of the Dangerous Waste Permit.

Submitted by Co-Operator:

5-1-

Reviewed by ORP Program Office:

Date

<sup>&</sup>lt;sup>1</sup> Class I modifications requiring prior Agency approval.

<sup>&</sup>lt;sup>2</sup> If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

Hanford Facility RCRA Permit Modification Notification Form				
Unit:	Permit Part & Chapter: Part III, Operating Unit 10			
Waste Treatment and Immobilization Plant				

#### Description of Modification:

The purpose of this Class 1 prime modification is to update the following Piping and Instrumentation Diagrams (P&IDs) for the LAW Melter Feed Process System Melter 1 and 2 Feed Preparation and Feed (LFP-VSL-00001, LFP-VSL-00003, and LFP-VSL-00004). The following permitted P&IDs are submitted to replace those currently in Appendix 9.2.

Appendix 9.2						
Replace:	24590-LAW-M6-LFP-P0001, Rev. 1	With:	24590-LAW-M6-LFP-P0001, Rev. 2			
	24590-LAW-M6-LFP-P0003, Rev. 1	]	24590-LAW-M6-LFP-P0003, Rev. 2			

The referenced P&IDs are complete revisions. They incorporate changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.) and changes associated with the resolution to comments on change documents since the issuance of the last revision of the permit drawing. This modification requests Ecology approval and incorporation into the permit the specific changes to these P&IDs that are indicated by note 42 shown on the drawings. The following is a summary of significant changes on the attached drawings.

#### 24590-LAW-M6-LFP-00001

- Added slope notation to specific lines
- Revised and added new notes
- Rerouted sample supply and return lines
- Modified ASD pump discharge line valve numbers and added magnetic flow meters as applicable
- Capped nozzle N21 and added a line number
- Rerouted overflow lines and added branches for cleanout
- Changed quality designator of drawing from CM to Q
- Added various ITS identifiers
- Reworded various off-sheet connector descriptions

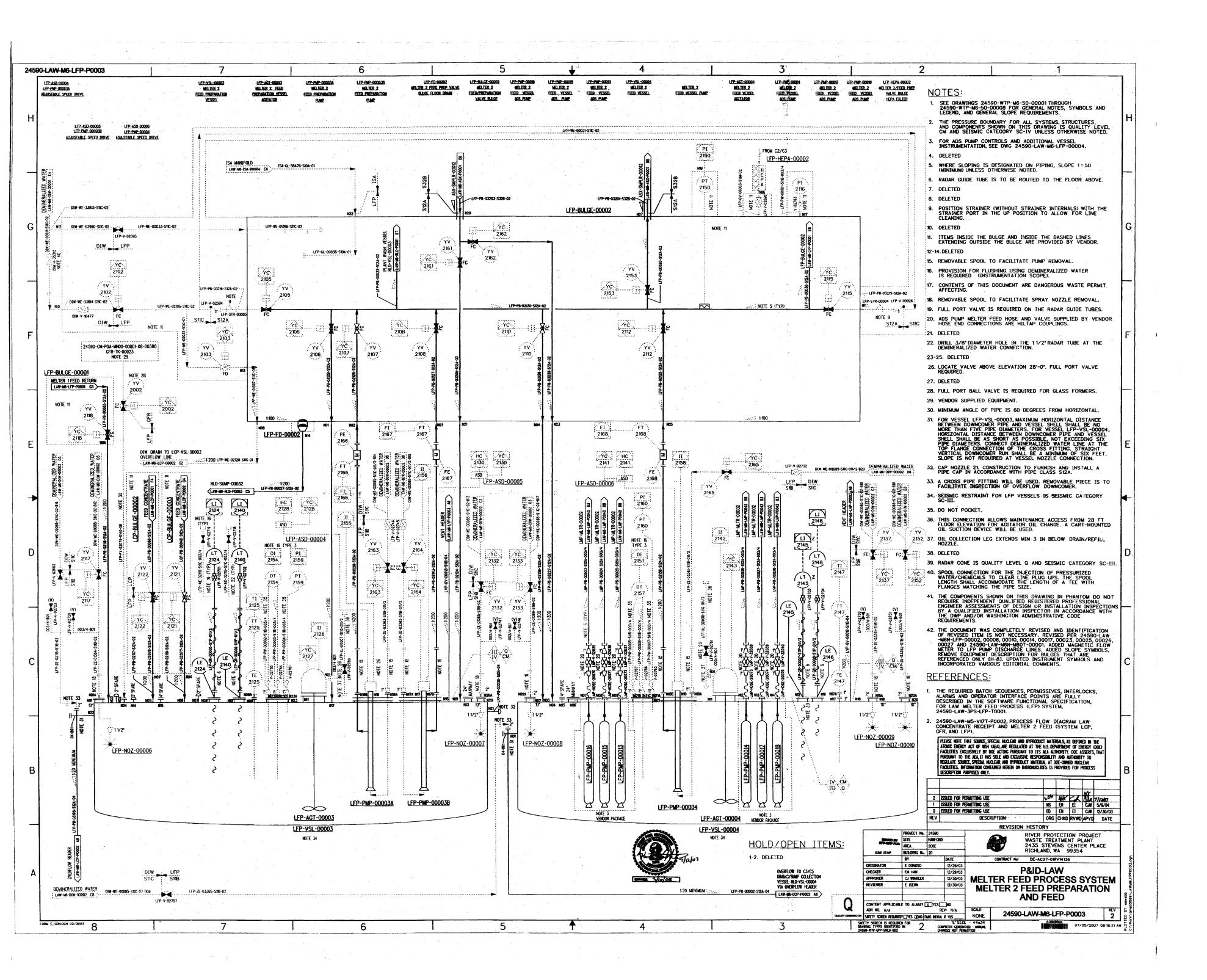
#### 24590-LAW-M6-LFP-00003

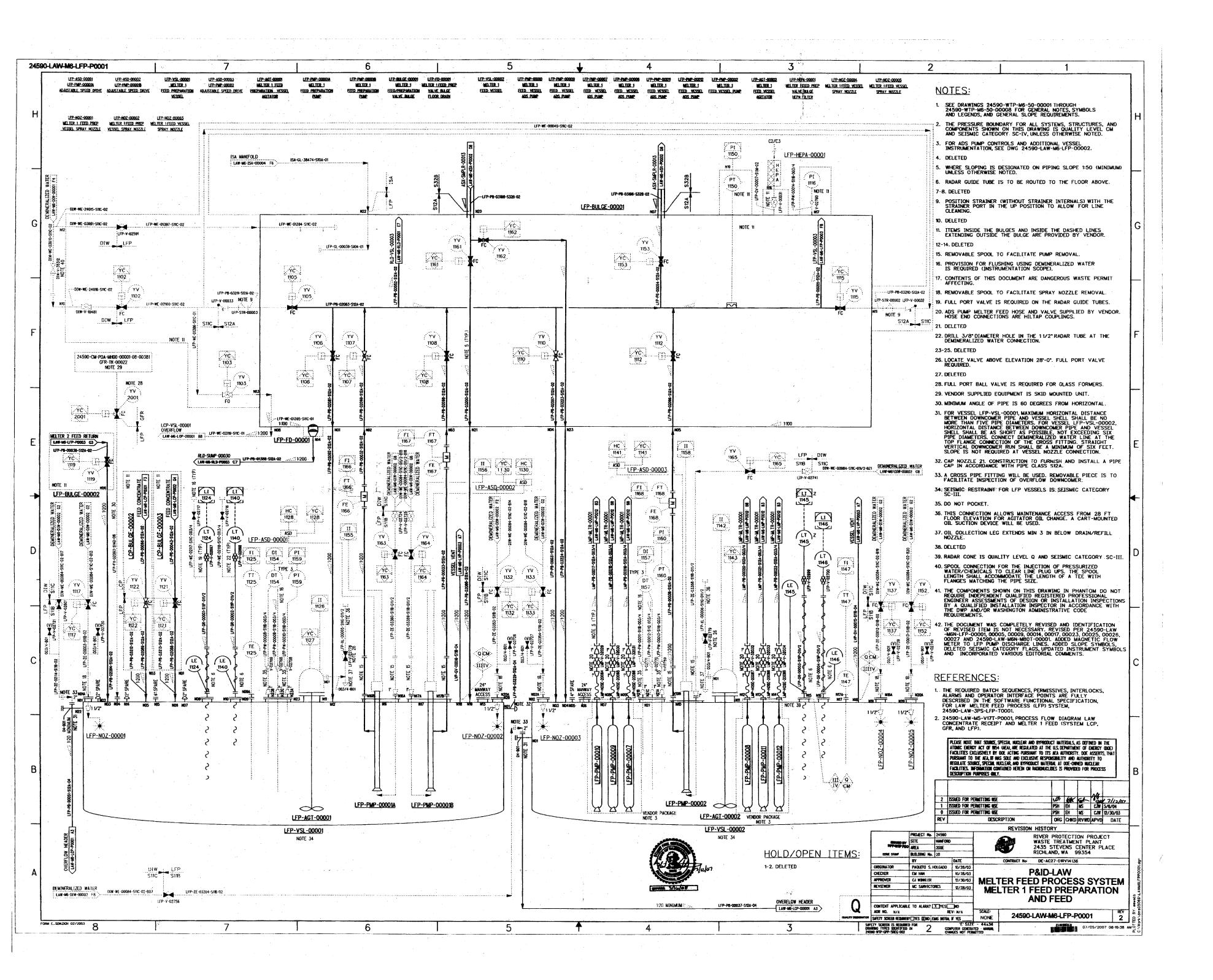
- Added slope notation to specific lines
- · Revised and added new notes
- Modified ASD pump discharge line valve numbers and added magnetic flow meters as applicable
- Capped nozzle N21 and added a line number
- Rerouted overflow lines and added branches for cleanout
- Changed quality designator of drawing from CM to Q
- Removed equipment description for LFP-BULGE-00003
- Added various ITS identifiers
- Reworded various off-sheet connector descriptions

<sup>&</sup>lt;sup>1</sup> Class 1 modifications requiring prior Agency approval.

<sup>&</sup>lt;sup>2</sup> If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

The following is a list of outstanding change documents that have not been incorporated into this modification:  • 24590-LAW-M6N-LFP-00021							
•							
				,			
	Olean 4	Class 11	Class 2	Class 3			
WAC 173-303-830 Modification Class: 12	Class 1	X	Class 2	Class 3			
Please mark the Modification Class:  Enter Relevant WAC 173-303-830, Appendix I Modification of	ritation number	^		<u></u>			
Enter wording of WAC 173-303-830, Appendix I Modification		, ,,,					
In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a							
Class <sup>1</sup> 1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions							
permit current with routine changes to facility or its operation or reduce the capacity of the facility to protect human health	n. I nese change or the environme	s go not substan ent. In the case (	tially after the pe of Class 1 modif	ications, the			
director may require prior approval."							
Modification Approved: Yes No (state reason for denial)		Re	Reviewed by Ecology:				
Reason for denial:							
		B. Becker	r-Khaleel	Date			
( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( )							





## Attachment 2 07-ESQ-130

Bechtel National, Inc. Certification Statement

### Bechtel National, Inc. Certification

The following certification statement is provided consistent with Contract No. DE-AC27-01RV14136, Section H.26, Environmental Permits, paragraph (g) for the submittal of the Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-LAW-PCN-ENV-07-001

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

W. S. Elkins

Project Director